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March 16, 2015

BY ECF

The Honorable Sandra L. Townes
United States District Judge
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Isa Martin v. City of New York, et al.*, 11 CV 4507 (SLT) (JO)

Your Honor:

I represent the plaintiff in the above-referenced civil rights action. I write to request a thirty-day enlargement of plaintiff's time to file a second amended complaint from April 15, 2015 to May 15, 2015. This is plaintiff's second request for an enlargement of time. Defense counsel consents to this request.

This matter is trial ready, with the joint pre-trial order currently due on January 15, 2016, and trial scheduled to begin on March 21, 2016. *See* ECF Doc. 39. As the Court may recall, plaintiff was directed to file a second amended complaint which "eliminates the Doe defendants from the caption, eliminates those causes of action which have been voluntarily dismissed, and specifies the defendants alleged to be liable for the causes of action which remain." The reason for this request is that over the last month I have been involved in a number of other matters and also spent time out of the office for a family vacation. The enlargement of time is required so that I can review the entire record in this case and draft plaintiff's second amended complaint. The enlargement of time will not cause any delay in the litigation given the above-mentioned scheduling order.

Thank you for your consideration.

Respectfully,



Jason Leventhal

cc: Andrew Lucas, Esq.